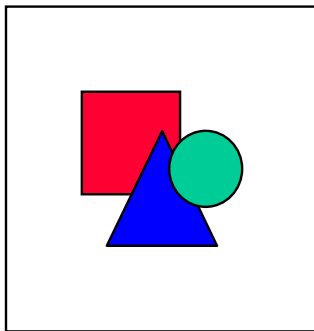


Ravalli County Sheriff's Office
205 Bedford Street, Suite G
Hamilton, MT 59840-2853



Chris Hoffman, Sheriff
Kevin McConnell, Undersheriff

September 18, 2003

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

RE: WT Docket No. 99-87/RM9332

Dear Ms. Dortch:

The Ravalli County Sheriff's Office would like to express its support for the petition for reconsideration filed by the Association of Public-Safety Communications Officials (APCO) and other public safety organizations in the above-referenced proceeding regarding mandatory migration to narrowband operations on land mobile radio systems in the VHF High Band (150-174 MHz) and UHF (421-512 MHz) frequencies.

The Ravalli County Sheriff's Office has several concerns regarding the effects of this mandate in general, and in particular the effects that this mandate will have on the effectiveness of public safety communications in Ravalli County. In the past ten years, Ravalli County has experienced rapid population growth. The population of Ravalli County grew approximately 44.2 percent during the period from 1990 to 2000. At this time, Ravalli County has over 37,000 residents, and the population is still growing. Unfortunately, a great deal of the public safety communications infrastructure in Ravalli County remains the same as it was ten years ago.

Public safety communications officials in Ravalli County have only recently realized that it is in the public's best interest to expand the public safety communications infrastructure in Ravalli County. The Ravalli County Sheriff's Office, in a cooperative effort with other public safety agencies in Ravalli County, Montana, and Idaho, has been gradually expanding the County's public safety communications infrastructure by adding new sites and frequencies. One of our goals is to maintain a communications system that is interoperable with those of our neighboring counties and State and Federal agencies that normally operate in our area, all of which are currently utilizing 25 kHz systems. Our efforts to this point have greatly enhanced public safety communications in the County, however there is still much work that needs to be done. Allowing us to continue to expand our current existing systems will provide our first responders with the ability to communicate with each other and with the dispatch center in locations where this would not be possible without these expansions.

Unfortunately, the current deadline of January 13, 2004 for the FCC to accept applications to modify existing 25 kHz systems, like ours, will prevent The Ravalli County Sheriff's Office and other public safety agencies from adding critical capacity and coverage to existing systems. The Ravalli County Sheriff's Office supports such modifications being

permitted until January 1, 2013, to coincide with a final complete migration date, as specified in the APCO petition.

Many first responders in the emergency medical and fire services in Ravalli County are volunteers, and have purchased their own radio equipment. A considerable amount of this equipment is old, and is not capable of operating on narrowband 12.5 kHz channels. If the current deadline of January 13, 2004 remains in place, this would force these dedicated men and women to purchase narrowband compatible radios in order to operate on any new narrowband frequencies and systems. These volunteers already have equipment that could be utilized if applications to modify existing or add new 25 kHz systems were accepted after January 13, 2004.

Another concern of The Ravalli County Sheriff's Office is the availability of 25 kHz capable radio equipment after the year 2008. The current rule will make it impossible for many state and local governments to add capacity or replace broken and worn-out radios after 2008, when 25 kHz capable radio equipment will no longer be allowed to be manufactured or imported. The Ravalli County Sheriff's Office supports that date also being extended to January 1, 2013, to coincide with a final complete migration date, as specified in the APCO petition. This will ensure that The Ravalli County Sheriff's Office will be able to maintain our current system until we can complete a system wide migration to narrowband frequencies on or before January 1, 2013.

The Ravalli County Sheriff's Office urges the FCC to give serious consideration to the proposals presented in the APCO petition. These proposals will allow a smooth migration from wideband to narrowband systems by January 1, 2013, and will enable the provision of vital public safety communications on existing 25 kHz systems until that time.

Respectfully submitted,

Ravalli County Sheriff's Office

By:

Chris Hoffman, Sheriff
Ravalli County

Joanna Hamilton, 911 Communications Director
Ravalli County